

Michael F. Ram (SBN 104805)
mram@forthepeople.com
Marie N. Appel (SBN 187483)
mappel@forthepeople.com
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Telephone: (415) 358-6913
Facsimile: (415) 358-6293

[Additional Attorneys for Plaintiff in Signature]

Ashley I. Kissinger (SBN 193693)
KissingerA@ballardspahr.com
Elizabeth L. Schilken (SBN 241231)
SchilkenE@ballardspahr.com
BALLARD SPAHR LLP
2029 Century Park East, Suite 1400
Los Angeles, CA 90067-2915
Telephone: 424.204.4400
Facsimile: 424.204.4350

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ODETTE R. BATIS, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

DUN & BRADSTREET HOLDINGS, INC.,
Defendant.

Case No. 22-cv-01924-MMC

**STIPULATED REQUEST FOR ORDER
CONTINUING ANTI-SLAPP MOTION
HEARING**

Complaint Filed: March 25, 2022

Pursuant to Local Rule 6-2, Plaintiff Odette R. Batis (“Plaintiff”) and Defendant Dun & Bradstreet Holdings, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel, hereby submit this stipulated request to continue the hearing on Defendant’s Special Motion to Strike Complaint Pursuant to Cal. Civ. Proc. Code § 425.16 and, in the alternative, Motion to Dismiss Pursuant to Fed. R. Civ. Proc. 12(b)(1) and 12(b)(6) (Doc. No. 18, the “Motion”), currently set for September 9, 2022, to September 23, 2022 or, if the Court is not available on that date, September 30, 2022. In support of this stipulation, the Parties state as follows:

1. Plaintiff filed her Complaint on March 25, 2022. (Doc. No. 1).

2. The Parties stipulated to an extension of time for Defendants to answer or otherwise respond to the Complaint to June 30, 2022. (Doc. No. 11). This Court granted that request. (Doc. No. 14).

3. Defendant filed its Motion on June 30, 2022 (Doc. No. 18).

4. This Court granted the Parties’ stipulated request to extend the deadline for Plaintiff’s opposition to the Motion to July 28, 2022, and to extend the deadline for Defendant’s reply in support of the Motion to August 18, 2022. (Doc. No. 20). In the same Order, this Court continued the hearing on Defendant’s Motion to September 9, 2022, continued the Case Management Conference to October 21, 2022, and ordered the Parties to file a Joint Case Management Statement no later than October 14, 2022. *Id.*

5. The September 9, 2022 hearing date set by the Court conflicts with an overseas family vacation of defendant’s lead counsel, Michael O’Donnell of Riker Danzig, who will return to the United States on September 18, 2022. Accordingly, the Parties have stipulated to continuing the hearing to September 23, 2022 or, if the Court is not available on that date, September 30, 2022.

1 THEREFORE, the Parties respectfully request that the hearing on Defendant's Motion
2 be rescheduled from September 9, 2022 to September 23, 2022 or, if the Court is not available
3 on that date, to September 30, 2022.

4 DATED: July 22, 2022

BALLARD SPAHR LLP

6 By: /s/Ashley I. Kissinger

Ashley I. Kissinger

Elizabeth L. Schilken

***Attorneys for Defendant
Dun & Bradstreet Holdings, Inc***

RIKER DANZIG SCHERER HYLAND &
PERRETTI LLP

11 By: /s/Michael R. O'Donnell

Michael R. O'Donnell (admitted pro
hac vice)

Michael P. O'Mullan (motion for
admission forthcoming)

MORGAN & MORGAN
COMPLEX LITIGATION GROUP

17 By: /s/ Michael F. Ram

Michael F. Ram

Marie N. Appel

LAW OFFICE OF BENJAMIN R. OSBORN

21 By: /s/ Benjamin R. Osborn

Benjamin R. Osborn (motion for
admission pro hac vice forthcoming)

23 DATED: July 22, 2022

TURKE & STRAUSS LLP

25 By: /s/ Raina C. Borrelli

Raina C. Borrelli (motion for admission
pro hac vice forthcoming)

Brittany Resch (admitted pro hac vice)

Attorneys for Plaintiff Odette R. Batis

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Maxine M. Chesney
Senior United States District Judge

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from each of the other Signatories.

Dated: July 22, 2022

/s/ Ashley Kissinger
Ashley Kissinger

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I, Ashley I. Kissinger, hereby declare as follows:

I am an attorney at Ballard Spahr LLP, and I serve as co-counsel for Defendant Dun & Bradstreet Holdings, Inc. (“Defendant”) in the above-referenced action. I have personal knowledge of the facts set forth herein except where stated on information and belief, and could and would competently testify to them under oath if called to do so.

As set forth in the accompanying stipulation, a long-planned overseas family vacation of lead counsel Michael O'Donnell of Riker Danzig conflicts with the Court-scheduled September 9, 2022 hearing date for Defendant's anti-SLAPP Motion brought pursuant to Cal. Civ. Proc. Code § 425.16 (the "Motion"). Mr. O'Donnell will return to the United States on September 18, 2022. Accordingly, the parties have stipulated to a continuance of the hearing on Defendant's Motion to September 23, 2022, or if the Court is not available on that date, to September 30, 2022.

This is the third request for extension of time in this matter. The first request (Doc. No. 11) was necessitated by the fact that Defendant's agent for service of process, CT Corporation, had made an administrative error and Defendant did not learn of the lawsuit until after its response to the Complaint was due. That request was granted, extending Defendant's time to answer or respond to the Complaint to June 30, 2022 (Doc. No. 14). The second request was necessitated by summer vacations and the Fourth of July holiday, which led the parties to submit a joint stipulation seeking modification of the briefing schedule. The request was granted, extending Plaintiff's time to file her opposition to Defendant's Motion to July 28, 2022, and extending Defendant's time to file its reply to August 18, 2022.

1 A continuation of the hearing date on Defendant's Motion to September 23 (or
2 September 30) would not have any further effect on the schedule for this matter, as the Court
3 has already continued the Case Management Conference and Case Management Statement
4 deadline to the latter half of October.

5 I declare under penalty of perjury under the laws of the United States that the foregoing
6 is true and correct. Executed on this 22nd day of July, 2022 in Boulder, Colorado.

7 /s/ Ashley I. Kissinger

8 Ashley I. Kissinger
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DATED this 22nd day of July, 2022.

By: /s/ Ashley Kissinger
Ashley Kissinger
Email: kissingera@ballardspahr.com
BALLARD SPAHR LLP
1225 17th St., Suite 2300
Denver, CO 80202-5596
Telephone: (303) 376-2407
Facsimile: (303) 296-3956